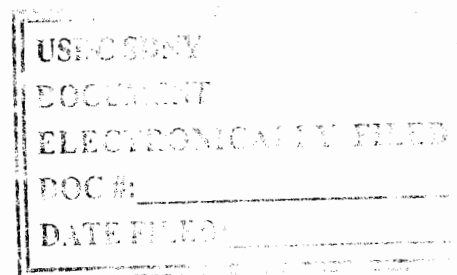


Maras, v. 111

THE SULTZER LAW GROUP, P.C.

Joseph Lipari (JL3194)
 Jason Sultzer (JS4546)
 85 Civic Center Plaza, Suite 104
 Poughkeepsie, New York 12601
 Tel: (845) 483-7100
 Fax: (888) 749-7747
 Email: liparij@thesultzerlawgroup.com
 sultzerj@thesultzerlawgroup.com

Counsel for Defendant Lifewatch, Inc.



**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

_____	X	
EDWARD J. REYNOLDS, D.D.S., Individually	:	
and on behalf of all others similarly situated,	:	
	:	Case No. 7:14-CV-3575-KMK
	:	
Plaintiff,	:	
v.	:	
	:	
LIFEWATCH, INC., LIFEWATCH, INC. d/b/a	:	
LIFEWATCH USA, ABC CORPORATIONS 1-10,	:	<u>STIPULATION SETTING FORTH</u>
AND JOHN DOES 1-10,	:	<u>TIME TO RESPOND TO SECOND</u>
	:	<u>AMENDED COMPLAINT</u>
Defendants.	:	
	:	
_____	X	

Plaintiff Edward J. Reynolds ("Plaintiff") and Defendant Lifewatch, Inc., also named as Lifewatch, Inc. d/b/a/ Lifewatch USA ("Defendant"), by and through their undersigned counsel, hereby stipulate to and request entry of an Order setting Defendant's time to answer the Second Amended Class Action Complaint through and until December 7, 2015.

After the court entered its September 29, 2015 order partially granting and partially denying Lifewatch's motion to dismiss plaintiff's Amended Complaint, Lifewatch filed an Answer to the Amended Complaint. (R. Doc. 78 and R. Doc. 80, respectively). Plaintiff then filed a Second Amended Complaint on October 29, 2015, which was refiled on October 30, 2015

to correct a clerical deficiency. (R. Doc. 81 and R. Doc. 83, respectively). Lifewatch filed a pre-motion letter and a motion to partially dismiss the Second Amended Complaint on November 19, 2015. (R. Doc. 86 and R. Doc. 87, respectively). Thereafter, the parties filed a stipulation of dismissal with prejudice relative to Plaintiff's unjust enrichment claim only. (R. Doc. 89). This stipulation of dismissal rendered Lifewatch's pre-motion letter and motion to partially dismiss moot. Now, the parties have agreed that, since the unjust enrichment claim has been dismissed with prejudice, Lifewatch will answer the remaining portion of the Second Amended Complaint on or before December 7, 2015. ✓

IT IS SO STIPULATED.

THE SULTZER LAW GROUP, P.C.

By: 

Joseph Lipari (JL3194)

Joseph Lipari (JL3194)
Jason P. Sultzer (JS4546)
85 Civic Center Plaza, Suite 104
Poughkeepsie, New York 12601
Phone: (845) 705-9460
liparij@thesultzerlawgroup.com

Attorneys for Defendant Lifewatch, Inc.

Gainey McKenna & Egleston

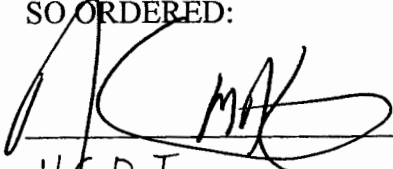
By: 

Barry Gainey

Barry Gainey
Gainey McKenna & Egleston
95 Route 17 South
Suite 310
Paramus, New Jersey 07652
Tel.: 201-225-9001
Fax: 201-225-9002
bgainey@gme-law.com

Attorneys for Plaintiff, Edward J. Reynolds, DDS

SO ORDERED:


U.S. D. J.

Dated:

November 30, 2015